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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Jeremy Stanfield, Romonia Persaud, and
Shabnam Sheila Dehdashtian, individually, on
behalf of all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

First NLC Financial Services, LLC, and
DOES 1 through 50 inclusive,

Defendants.

Case No. C 06-3892 SBA JL

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DATE OF
HEARING ON PLAINTIFFS'
STATEMENT REQUESTING LEAVE
TO TAKE MORE THAN 10
DEPOSITIONS AND TO COMPEL
NOTICED DEPOSITIONS, AND TO
CONTINUE DEADLINE FOR
PLAINTIFFS' REPLY BRIEF
REGARDING SAME**

Date Action Filed: June 22, 2006

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Attorneys for Defendant
First NLC Financial Services, LLC

1 Plaintiffs Jeremy Stanfield, *et al.* ("Plaintiffs"), on the one hand, and Defendant First NLC
2 Financial Services, LLC ("Defendant" or "First NLC"), on the other hand (collectively, the
3 "parties"), through their respective counsel, HEREBY STIPULATE and AGREE pursuant to
4 Local Rule 6-2 as follows:

5 1. Plaintiffs filed their Statement Requesting Leave To Take More Than 10
6 Depositions And To Compel Noticed Depositions ("Plaintiffs' Request") on April 5, 2007. A
7 hearing was set for June 6, 2007.

8 2. The parties have been engaged in settlement negotiations. The parties agree that it
9 would be injurious to the settlement process for the parties and counsel to have to devote
10 substantial time and resources to address litigation demands.

11 3. Therefore, the parties stipulate and agree that the hearing on Plaintiffs' Request
12 shall be continued five (5) weeks, until July 11, 2007, with Plaintiffs' reply brief regarding this
13 motion due two weeks prior to the hearing, on June 27, 2007.

14 4. The parties have stipulated, and the Court has ordered, prior continuances to the
15 class certification discovery deadline in this case, as set forth in the Court's scheduling order.

16 5. The requested modification to the hearing date should not have an impact on the
17 schedule for this case.

18 6. The parties respectfully request that the May 1, 2007 Notice and Order Setting
19 Hearing (Dkt. #251) shall be revised to state:

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The above entitled case has been set for hearing plaintiff's motion to take depositions and compel noticed depositions on **July 11, 2007** at 9:30 a.m., in Courtroom F, 15th Floor, before Magistrate Judge James Larson.

In accordance with Civil Local Rule 7-3, any reply to the opposition, already filed, shall be served and filed no later than fourteen (14) days prior to the date of the hearing.

SO STIPULATED.

Dated: May 18, 2007

NICHOLS KASTER & ANDERSON, LLP

By: _____/s/
Bryan J. Schwartz
Attorneys for Plaintiffs and Representative Plaintiffs

Dated: May 18, 2007

ORRICK, HERRINGTON & SUTCLIFFE LLP
NELSON MULLINS RILEY & SCARBOROUGH
LLP

By: _____/s/
Michael D. Weil
Attorneys for Defendant
First NLC Financial Services, LLC

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 22, 2007

